

While I am not personally located in the BellSouth service area, the principles involved are the same. I am a DSL customer of a regional independent ISP that I substantially prefer over the ILEC's own ISP service. In the 4.5 years that I have used this arrangement (which would have been 4.75 years if the ILEC hadn't taken approximately 100 days to perform an installation requiring zero work on customer premises), every significant service outage (including one taking four days to repair and one taking eight days to repair) has been due to misconfigurations by telco personnel. And yet the BellSouth proposal (and others like it) would *expand* the portion of my Internet service controlled by an monopoly with minimal incentive to provide even competent service, let alone quality service. And BellSouth has the unmitigated gall to describe this as being "in the interests of competition".

It's unfortunate that for practical reasons, the "last mile" is a natural monopoly. Even when cable is counted, it's still a duopoly, which isn't much better, particularly given that the "competition" is from a company whose focus (and experience) is primarily on delivering entertainment to a passive audience, rather than on delivering reliable and efficient telecommunications. The other alternatives (terrestrial and satellite wireless) have significant inherent disadvantages, and broadband over power lines is still pie-in-the sky. In this environment, market forces do not provide sufficient feedback, and thus adequate regulation becomes a governmental responsibility.

If anything, the present regulations are too lax, since they allow ILECs to sell themselves DSL aggregation at a considerably lower cost than they charge independent ISPs, making it difficult for the latter to compete on price. BellSouth argues that, since they already own 90% of the DSL market in their area, giving them the last 10% wouldn't hurt much. But its interesting to note that 10% of the market has chosen alternatives *in spite of* the price disadvantage, thereby demonstrating significant benefits provided by the independents. That 10% would be likely to grow much larger if priced on a level playing field.

The United States is already well behind a number of other nations in both price and speed of DSL service, mainly because the ILECs "last mile" monopoly on DSL gives them little incentive to do anything beyond being "better than cable". Allowing them to expand the scope of their monopolies can only make this worse.

In conclusion, I expect that I speak for many customers of independent DSL ISPs when I object to the proposed rule change.